

ATTACHMENT A-4

Vehicle to Be Searched (SUBJECT VEHICLE)

This warrant authorizes the search of a red, 2021, Acura RDX, bearing Washington license plate BWP2727; and VIN: 5J8TC2H57ML014595 and the **SUBJECT PREMISES.**



ATTACHMENT B

List of Items to Be Seized

Evidence, fruits, and instrumentalities of violations of 21 U.S.C. § 841(a)(1) (Distribution of and Possession with Intent to Distribute Controlled Substances), involving TRI DUONG, as follows:

1. **Controlled Substances:** Including but not limited to methamphetamine, fentanyl, cocaine, crack cocaine, heroin, hashish, marijuana, MDMA, methadone, oxycodone, Oxycontin, Suboxone, Clonazepam, Alprazolam, Xanax, and Adderall;

2. **Drug Paraphernalia:** Items used, or to be used, to store, process, package, use, and/or distribute controlled substances, such as plastic bags, DVD cases, cutting agents, scales, measuring equipment, vials, pill presses, Mylar bags, heat/vacuum sealers, tape, duffel bags, chemicals or items used to test the purity and/or quality of controlled substances, and similar items;

3. **Drug Transaction Records:** Documents such as ledgers, receipts, notes, and similar items relating to the acquisition, transportation, and distribution of controlled substances;

4. **Customer and Supplier Information:** Items identifying drug customers and drug suppliers, such as telephone records, personal address books, correspondence, diaries, calendars, notes with phone numbers and names, "pay/owe" sheets with drug amounts and prices, maps or directions, and similar items;

5. **Cash and Financial Records:** Currency and financial records, including bank records, safe deposit box records and keys, credit card records, bills, receipts, tax returns, vehicle documents, and similar items; and other records that show income and expenditures, net worth, money transfers, wire transmittals, negotiable instruments, bank drafts, cashier's checks, and similar items, and money counters;

6. **Photographs/Surveillance:** Photographs, video tapes, digital cameras, surveillance cameras and associated hardware/storage devices, and similar items, depicting property occupants, friends and relatives of the property occupants, or suspected buyers or sellers of controlled substances, controlled substances or other contraband, weapons, and assets derived from the distribution of controlled substances;

7. **Weapons:** Including but not limited to firearms, magazines, ammunition, and body armor;

1 8. Codes: Evidence of codes used in the distribution of controlled substances,
2 including passwords, code books, cypher or decryption keys, usernames and/or
3 credentials for dark web marketplaces, and similar information;

4 9. Property Records: Deeds, contracts, escrow documents, mortgage
5 documents, rental documents, and other evidence relating to the purchase, ownership,
6 rental, income, expenses, or control of the premises, and similar records of other property
owned or rented;

7 10. Indicia of occupancy, residency, and/or ownership of assets including,
8 utility and telephone bills, canceled envelopes, rental records or payment receipts, leases,
9 mortgage statements, and other documents;

10 11. Evidence of Storage Unit Rental or Access: Rental and payment records,
11 keys and codes, pamphlets, contracts, contact information, directions, passwords or other
documents relating to storage units;

12 12. Evidence of Personal Property Ownership: Registration information,
13 ownership documents, or other evidence of ownership of property including, but not
14 limited to vehicles, vessels, boats, airplanes, jet skis, all-terrain vehicles, RVs, and
15 personal property; evidence of international or domestic travel, hotel/motel stays, and any
other evidence of unexplained wealth;

16 13. Individual and business financial books, records, receipts, notes, ledgers,
17 diaries, journals, and all records relating to income, profit, expenditures, or losses, such
18 as:

19 a. Employment records: paychecks or stubs, lists and accounts of
20 employee payrolls, records of employment tax withholdings and contributions, dividends,
stock certificates, and compensation to officers.

21 b. Savings accounts: statements, ledger cards, deposit tickets, register
22 records, wire transfer records, correspondence, and withdrawal slips.

23 c. Checking accounts: statements, canceled checks, deposit tickets,
24 credit/debit documents, wire transfer documents, correspondence, and register records.

25 d. Loan Accounts: financial statements and loan applications for all
26 loans applied for, notes, loan repayment records, and mortgage loan records.

27 c. Collection accounts: statements and other records.
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1 f. Certificates of deposit: applications, purchase documents, and
2 statements of accounts.

3 g. Credit card accounts: credit cards, monthly statements, and receipts
4 of use.

5 h. Receipts and records related to gambling wins and losses, or any
6 other contest winnings.

7 i. Insurance: policies, statements, bills, and claim-related documents.

8 j. Financial records: profit and loss statements, financial statements,
9 receipts, balance sheets, accounting work papers, any receipts showing purchases made,
10 both business and personal, receipts showing charitable contributions, and income and
expense ledgers.

11 14. All bearer bonds, letters of credit, money drafts, money orders, cashier's
12 checks, travelers checks, Treasury checks, bank checks, passbooks, bank drafts, money
13 wrappers, stored value cards, and other forms of financial remuneration evidencing the
obtaining, secreting, transfer, and/or concealment of assets and/or expenditures of money;

14 15. All Western Union and/or Money Gram documents and other documents
15 evidencing domestic or international wire transfers, money orders, official checks,
16 cashier's checks, or other negotiable interests that can be purchased with cash, to include
17 applications, payment records, money orders, frequent customer cards, etc;

18 16. Negotiable instruments, jewelry, precious metals, financial instruments, and
19 other negotiable instruments;

20 17. Documents reflecting the source, receipt, transfer, control, ownership, and
21 disposition of United States and/or foreign currency;

22 18. Correspondence, papers, records, and any other items showing employment
23 or lack of employment;

24 19. Telephone books, and/or address books, facsimile machines, any papers
25 reflecting names, addresses, telephone numbers, pager numbers, cellular telephone
26 numbers, facsimile, and/or telex numbers, telephone records and bills relating to co-
27 conspirators, sources of supply, customers, financial institutions, and other individuals or
28 businesses with whom a financial relationship exists. Also, telephone answering devices
that record telephone conversations and the tapes therein for messages left for or by co-

1 conspirators for the delivery or purchase of controlled substances or laundering of drug
2 proceeds;

3 20. Safes and locked storage containers, and the contents thereof which are
4 otherwise described in this document;

5 21. Tools: Tools that may be used to open hidden compartments in vehicles,
6 paint, bonding agents, magnets, or other items that may be used to open/close said
7 compartments;

8 22. Any and all mailing documents and packaging materials related to U.S.
9 Postal Service, UPS, and FedEx, including but not limited to USPS Express Mail labels,
10 express mail and priority envelopes, first class mailings, receipts for USPS packages, and
11 tracking information;

12 23. Any records or information pertaining to the dark web and dark web
13 marketplaces, including the Empire Market, Deep Sea Market, and White House Market;

14 24. Any records or information pertaining to darknet monikers;

15 25. Cryptocurrency applications and wallets, including information regarding
16 current account balance and transaction history, i.e., date, time, amount, an address of the
17 sender/recipient of a cryptocurrency transaction maintained in such wallets;

18 26. Any records or information reflecting cryptocurrencies, including web
19 history, and documents showing the location, source, and timing of acquisition of any
20 cryptocurrencies, including wallets, wallet addresses, and seed phrases;

21 27. Any and all cryptocurrency, to include the following: (a) any and all
22 representations of cryptocurrency public keys or addresses, whether in electronic or
23 physical format; (b) any and all representations of cryptocurrency private keys, whether
24 in electronic or physical format; and (c) any and all representations of cryptocurrency
25 wallets or their constitutive parts, whether in electronic or physical format, to include
26 "recovery seeds" and "root keys" which may be used to regenerate a wallet.

27 a. The United States is authorized to seize any and all cryptocurrency
28 by transferring the full account balance in each wallet to a public cryptocurrency address
controlled by the United States.

b. The United States is also authorized to use the above-described
recovery seeds and root keys to reconstitute and/or regenerate any associated

1 cryptocurrency wallet and to seize any and all cryptocurrency stored in, or accessible via,
2 such wallet by transferring the full account balance to a public cryptocurrency address
3 controlled by the United States;

4 28. Cell Phones: Cellular telephones and other communications devices may be
5 seized, and searched for the following items:

6 a. Assigned number and identifying telephone serial number (ESN,
7 MIN, IMSI, or IMEI);

8 b. Stored list of recent received, sent, and missed calls;

9 c. Stored contact information;

10 d. Stored photographs of narcotics, currency, firearms or other
11 weapons, evidence of suspected criminal activity, and/or the user of the phone and/or co-
12 conspirators, including any embedded GPS data associated with these photographs;

13 e. Stored text messages, as well as any messages in any internet
14 messaging apps, including but not limited to Facebook Messenger, iMessage, Wickr,
15 Telegram, Signal, WhatsApp, Kik, and similar messaging applications, related to the
16 aforementioned crimes of investigation or that may show the user of the phone and/or
co-conspirators, including Apple iMessages, Blackberry Messenger messages or other
similar messaging services where the data is stored on the telephone;

17 f. Any Tor applications and records for Tor activity, including browser
18 history and "bookmarked" or "favorite" web pages;

19 g. Digital currency applications and wallets, to include information
20 regarding current account balance and transaction history, i.e., date, time, amount, an
21 address of the sender/recipient of a digital currency transaction maintained in such
wallets;

22 h. Stored documents, notes, and files that contain passwords/or
23 encryption keys;

24 i. PGP applications, to include stored private and/or public keys;

25 j. Any records or information related to darknet monikers; and
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27 29. Digital devices, such as computers, and other electronic storage media,
28 such as USBs and Trezor devices, may be seized, and searched for the following items:

1 a. Evidence of who used, owned, or controlled the digital device or
2 other electronic storage media at the time the things described in this warrant were
3 created, edited, deleted, such as logs, registry entries, configuration files, saved
4 usernames and passwords, documents, browsing history, user profiles, email, email
contacts, "chats," instant messaging logs, photographs, and correspondence;

5 b. Evidence of software that would allow others to control the digital
6 device or other electronic storage media, such as viruses, Trojan horses, and other forms
7 of malicious software, as well as evidence of the presence or absence of security software
designed to detect malicious software;

8 c. Evidence of the lack of such malicious software;

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10 d. Evidence of the attachment to the digital device of other storage
11 devices or similar containers for electronic evidence;

12 e. Evidence of counter-forensic programs (and associated data) that are
13 designed to eliminate data from the digital device or other electronic storage media;

14 f. Evidence of the times the digital device or other electronic storage
15 media was used;

16 g. Passwords, encryption keys, and other access devices that may be
17 necessary to access the digital device or other electronic storage media;

18 h. Contextual information necessary to understand the evidence
19 described in this attachment;

20 i. Records or information pertaining to the dark web and dark web
21 marketplaces, including the Empire Market.

22 j. Any records or information pertaining to darknet monikers;

23 k. Any records or information pertaining to Tor;

24 l. Any records or information pertaining to mnemonic phrases;

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26 m. Any records or information reflecting cryptocurrencies, including
27 web history, and documents showing the location, source, and timing of acquisition of
28 any cryptocurrencies, to include wallets, wallet addresses, and seed phrases; and

1 n. Any records or information pertaining to PGP applications, to
2 include private and/or public keys.

3 THE SEIZURE OF DIGITAL DEVICES IS AUTHORIZED FOR THE PURPOSE OF
4 CONDUCTING OFF-SITE EXAMINATION OF THEIR CONTENTS FOR
5 EVIDENCE, INSTRUMENTALITIES, OR FRUITS OF THE AFOREMENTIONED
6 CRIMES.
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AO 93C (08/18) Warrant by Telephone or Other Reliable Electronic Means (Page 2)

Return

Case No.: MS21-311	Date and time warrant executed: 5/27/2021 2:18 PM	Copy of warrant and inventory left with: IN VEHICLE BWP 2727
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Inventory made in the presence of:

TODD SALTER

Inventory of the property taken and name(s) of any person(s) seized:

- 1.) **TWO PRIORITY BOXES**
- 2.) **TWO SELF-SEALING POLY BUBBLE MAILER**
- 3.) **FOUR PRIORITY MAILING ENVELOPES (THREE OF FOUR CONTAIN OTHER PACKAGING MATERIAL)**
- 4.) **SILVER IN COLOR BRACELET IN SWAROVSKI BOX**
- 5.) **BLACK INSULATED BAG**
- 6.) **USPS MAIL TUB**
- 7.) **\$13,500 USD**

Certification

I declare under penalty of perjury that this inventory is correct and was returned along with the original warrant to the designated judge.

Date: **5/27/2021****Shane Vaughan**

Executing officer's signature

TERRY D. STINSON, POSTAL INSPECTOR
Printed name and title